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*Attorneys for Plaintiff Bonnie Magallon
and the certified class*

IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF OREGON
EUGENE DIVISION

**BONNIE MAGALLON,
On behalf of herself and all others similarly
situated,**

Plaintiff,

v.

ROBERT HALF INTERNATIONAL, INC.,
a foreign corporation,

Defendant.

Civil No. 6:13-cv-01478-SI .

**DECLARATION OF JOHN
SOUMILAS IN SUPPORT OF
PLAINTIFF'S MOTION TO
EXCLUDE PORTIONS OF
THE REPORT AND
TESTIMONY OF REBECCA
KUEHN**

**DECLARATION OF JOHN SOUMILAS IN SUPPORT OF PLAINTIFF'S MOTION
TO EXCLUDE PORTIONS OF THE EXPERT REPORT AND TESTIMONY
OF REBECCA KUEHN**

I, John Soumilas, hereby declare as follows:

1. I am an attorney duly licensed to practice in the Commonwealth of Pennsylvania and the State of New Jersey.

2. I am one of the counsel of record for Plaintiff Bonnie Magallon and the class, after being admitted to practice *pro hac vice* by this Court on April 25, 2014 (ECF 15), and have personal knowledge of the facts and circumstances of this matter.

3. Attached hereto as Exhibit A is a true and correct copy of the Expert Report of Rebecca E. Kuehn produced in this matter, dated January 5, 2024.

4. Attached hereto as Exhibit B is a true and correct copy of the transcript of the deposition of Rebecca E. Kuehn, taken on February 28, 2024.

5. Attached hereto as Exhibit C is a true and correct copy of Defendant Robert Half International, Inc.'s Responses to Plaintiff Bonnie Magallon's Interrogatories, dated May 1, 2014.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 1, 2024

/s/ John Soumilas
John Soumilas

1 Declaration of John Soumilas in Support of Plaintiff's Motion to Exclude Portions of the Expert Report and Testimony of Rebecca Kuehn